REMARKS/ARGUMENTS

Applicants have received the Office action dated September 27, 2004, in which the Examiner: 1) rejected claims 1-22 under 35 U.S.C. § 103(a) as being unpatentable over Contractor (U.S. Pat. Pub. No. 2003/0100319) in view of Jones et al. (U.S. Pat. No. 6,744,880).

At the time of the Office action, claims 1-22 were pending in this application. With this Response, Applicants have amended claims 1, 2, 5-10, 14, 16, 17, 19, and 21, and canceled claims 3, 4, and 15. Currently, claims 1, 2, 5-14, and 16-22 are pending.

The Applicants submit that it is important to distinguish between control signals, in particular signaling system seven control signals, used in the public system telephone network and the telephone calls, i.e., communications or content, that are transmitted over the public system telephone network. The signaling system seven control signals are used to direct a call from an originating telephone to the called telephone and to build the switched connections that allow a two way communication, i.e., telephone call, between the two end points. As noted in the Contractor reference in par. 13, "The actual voice call is transmitted over a circuit-switched network, but the signaling is done on a separate packet-switched network." Thus, the two types of signals are quite different.

The references cited by the Examiner are concerned exclusively with routing of telephone calls. The references necessarily use signaling system seven control signals (sometimes also referred to as messages) to route the telephone calls. But the references provide no teachings concerning routing of the signaling system seven control signals, much less any teaching of a more efficient way of routing such control signals.

The present invention is concerned with improved routing of signaling system seven control signals or messages, not with routing of telephone calls.

Regarding claim 1, the Examiner asserts that Contractor teaches a PSTN device comprising; a first subsystem Fig. 1, 40; a second subsystem, a PDE; a module on SCP 28 for receiving location data from the first subsystem MPC 40, comparing that information to a PSAP database and routing the call to an

appropriately located emergency service. The Examiner notes that Contractor does not teach converting an outbound message to an inbound message if the destination of the message (telephone call ?) is the second subsystem; but rather comparing the location of the wireless device with a location of the wire line device, delivering the call to the wireless device when the location of the wireless device is not within a predetermined vicinity of the location of the wire line device and vise versa.

The Examiner asserts that Jones et al. teach a method for conversion and routing of telephone calls arriving on a number of telephone interfaces is performed by conversion to dial number via database lookup, selecting an outbound pathway, and placing outbound calls and switched connection to inbound call.

The Examiner further asserts that it would have been obvious to modify Contractor's system to include the feature of converting the outbound message to an inbound message if the destination for the message is the second subsystem, as taught by Jones, in order to have more efficient system and methods for sending SS7 messages between subsystems.

The Applicants traverse these rejections. The Applicants disagree with the Examiner's reading of the references. The Applicants submit that: the references provide no teachings for routing SS7 messages, i.e., control signals; there would be no reason for combining the references; and, no combination of the references would equal or suggest the present invention.

Contractor does teach a service control point 28 having multiple subsystems, but the PDE suggested by the Examiner is not in SCP 28. Contractor includes means for receiving location data concerning both the land line phone and the wireless phone. Contractor does not teach or suggest routing the call to an emergency service. Contractor does teach routing a call to a wireless phone, unless it is located close to its related landline phone. Contractor teaches nothing about routing SS7 control signals between subsystems in an SCP. Contractor teaches nothing about determining the network location of SCPs or the location of subsystems contained in SCPs. Contractor is only

concerned with locating two telephones and routing a telephone call to one of them based on their relative locations.

Jones discloses an interface device for connecting telephone calls (not SS7 control signals) between various portions of the telephone network that operate with different protocols. A specific example is connecting calls between old PBXs, that operate in the analog format, and a modern digital telephone system. Jones' device provides a switched connection, i.e., a voice call connection, between telephones operating in different formats. To do that, it must convert the calls both ways, i.e., inbound and outbound, simultaneously to provide a two way conversation. Jones teaches nothing about routing SS7 control signals between SCPs, much less anything about a more efficient way of routing such SS7 control signals.

Claim 1 has been amended to make it clear that the present invention relates to improvements in routing SS7 control signals or messages. Those skilled in the art know that such messages are digital packets and are quite distinct from telephone calls. Since the references do not provide any teachings concerning routing of SS7 control signals, the Applicants submit that no combination of the references could anticipate or make obvious the present invention as covered by claim 1.

The other independent claims 11, 14, and 19 were rejected for the same reasons as claim 1. In view of the above remarks, the Applicants submit that claims 1, 11, 14, and 19 are patentable over the applied references.

As to claim 19, the Examiner asserts that when a calling party places a call, an inbound message is sent to MC 40 that interfaces with a variety of PDEs. The Examiner notes that Contractor does not teach updating the message stored in the memory to include results of the processing of the inbound message with the first subsystem and using the stored and updated message to send an outbound message. The Examiner asserts that it is obvious that during these steps, these messages need to be stored and updated and used to send before sending to the second subsystem or desired destination.

The Applicants submit that Contractor does not teach storing of any signaling control signal in a memory and does not teach using a stored inbound signal as an outbound signal, or as part of an outbound signal. The Applicants request that the Examiner provide some basis for what he considers to be obvious. As discussed in the present application, the prior art of receiving, processing and sending SS7 control signals required that each outbound signal be constructed after the inbound signal had been read and processed by layers. The prior art did not provide for storing the complete inbound message until the system determined if it could be used as, at least part of, an outbound message.

Since independent claims 1, 11, 14 and 19 have been shown to be patentable over the cited references, the Applicants submit that dependent claims 2, 5-10, 12, 13, 16-18 and 20-22 are also patentable over the references.

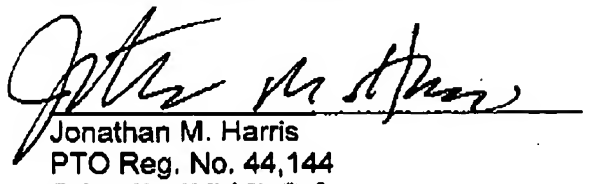
In view of the above remarks, the Applicants submit that claims 1, 2, 5-14, and 16-22, as amended, are patentable over the applied references. Allowance of these claims is requested.

In the course of the foregoing discussions, Applicants may have at times referred to claim limitations in shorthand fashion, or may have focused on a particular claim element. This discussion should not be interpreted to mean that the other limitations can be ignored or dismissed. The claims must be viewed as a whole, and each limitation of the claims must be considered when determining the patentability of the claims. Moreover, it should be understood that there may be other distinctions between the claims and the cited art which have yet to be raised, but which may be raised in the future.

Applicants respectfully request reconsideration and that a timely Notice of Allowance be issued in this case. It is believed that no extensions of time or fees are required, beyond those that may otherwise be provided for in documents accompanying this paper. However, in the event that additional extensions of time are necessary to allow consideration of this paper, such extensions are hereby petitioned under 37 C.F.R. § 1.136(a), and any fees required (including

fees for net addition of claims) are hereby authorized to be charged to Hewlett-Packard Development Company's Deposit Account No. 08-2025.

Respectfully submitted,



Jonathan M. Harris
PTO Reg. No. 44,144
CONLEY ROSE, P.C.
(713) 238-8000 (Phone)
(713) 238-8008 (Fax)
ATTORNEY FOR APPLICANTS

HEWLETT-PACKARD COMPANY
Intellectual Property Administration
Legal Dept., M/S 35
P.O. Box 272400
Fort Collins, CO 80527-2400